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April 7, 2015

***FILED VIA ECF***

Hon. Alison J. Nathan  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: United States v. Nunzio Gentile,  
14 CR 608 (AJN)**

Dear Judge Nathan:

On behalf of defendant, Nunzio Gentile, and with government's consent, we would respectfully request that he be permitted a visit with his dying mother, Theresa Guss tomorrow morning, April 8, 2015. The visit would be to the Avalon Gardens Nursing Home, located at 7 Route 25A, Smithtown, N.Y., which is roughly 20 minutes away from where he currently resides.

We make this request because Mr. Gentile is scheduled to plead guilty in this case on Thursday, April 9<sup>th</sup>, subsequent to, the Court is obligated to detain him. Ms. Guss is bed-ridden with advanced COPD, Chronic Kidney Disease, Epilepsy, as well as bipolar and depressive disorder. I am advised that there is no chance that she will live anywhere near the amount of time the defendant is facing relative to this case.

Accordingly, I would respectfully request that the defendant be permitted to see his mother from 8AM to 11AM tomorrow morning. Immediately thereafter he will be coming to my office for final preparations relative to Thursday's plea.

The Court's consideration is greatly appreciated.

Respectfully,



Barry S. Zone

cc: AUSA Edward Diskant  
AUSA Andrew Beaty